

ATTACHMENT 2-4 IG TRAINING PLAN

1.0 PERSONNEL TRAINING: R315-8-2.7

- 1.0.1 The Igloo G training plan has been developed to ensure that personnel involved with storage and management of hazardous wastes at Igloo G perform their duties according to accepted practices. Personnel identified in this plan must receive sufficient training to ensure that the facility is operated in a manner that will protect human health and the environment.
- 1.0.2 The training plan covers only hazardous waste management requirements. Other training requirements; such as those required by Dugway Proving Ground (DPG), the U.S. Army, the Occupational Safety and Health Administration (OSHA), or other agency; are not specifically included in this plan.

1.1 Training Objectives: R315-8-2.7(a)(1)

- 1.1.1 The objective of all hazardous waste training is to provide the employee with the information needed to perform tasks in accordance with hazardous waste regulations. The hazardous waste training program for Igloo G is tailored to address employee duties and the types of wastes handled at that facility.
- 1.1.2 All personnel who are involved in handling or managing hazardous wastes at Igloo G receive training as specified in this training plan. All employees with responsibilities for Igloo G emergency response must be knowledgeable of the procedures detailed in the Igloo G Contingency Plan in Attachment 2-7 of this Permit.

1.2 Training Director: R315-8-2.7(a)(2)

- 1.2.1 The DPG Environmental Training Director shall ensure that each employee has completed all of the hazardous waste training for his or her specific job. As such, this person must be familiar with hazardous waste training requirements as well as the requirements of the Igloo G Permit including this Training Plan. The Training Director arranges for qualified instructors, schedules training, and ensures the quality of instruction. The Training Director ensures that all training is documented and that documentation is available for review.

1.3 Emergency Response Training: 40 CFR 264.16(a)(3)

- 1.3.1 Specified personnel are trained to respond properly to emergency situations as described in the Igloo G Contingency Plan (Attachment 2-7). All Igloo G personnel shall be familiar with the Contingency Plan, be able to identify emergency situations, and respond properly. Emergency response personnel should periodically rehearse implementation of the Contingency Plan.

2.0 TRAINING PROGRAM: R315-8-2.7(a)(1)

- 2.0.1 The Igloo G training program is designed to provide Igloo G personnel with sufficient training to perform their hazardous waste related job functions. Igloo G personnel responsibilities are outlined in Section 2.1. Specific training topics are described in Section 2.2.

2.1 Personnel Responsibilities: 40 CFR 264.16(d)(1)

2.1.1 Training objectives are based on an individual's job responsibilities. Job descriptions of key Igloo G personnel include:

- Site Manager: This individual is responsible for overall operations at Igloo G. Specific hazardous waste responsibilities include:
 - Ensure personnel safety
 - Prepare and review Igloo G operating procedures
 - Assist with waste characterization and acceptance
 - Package waste
 - Inventory waste
 - Inspect waste containers
 - Document operations
 - Ensure facility Security
 - Ensure personnel training
 - Prepare for emergencies
 - Respond to emergencies
- Site Technicians: These individuals report directly to the Site Manager. Their specific hazardous waste responsibilities include:
 - Ensure personnel safety
 - Assist with waste acceptance
 - Package waste
 - Inventory waste
 - Inspect waste containers
 - Document operations
 - Ensure facility security
 - Respond to emergencies
- Entry Personnel: The entry team includes personnel designated for first entry, air monitoring, decontamination, medical support, and security. These individuals may be U.S. Army, DPG, or contractor personnel and are specifically approved by DPG for CWA igloo entry. Their specific hazardous waste responsibilities include:
 - Ensure personnel safety
 - Enter Igloo G
 - Inspect waste containers
 - Document operations
 - Identify and respond to spills or leaks
 - Respond to emergencies
- Air Monitoring Personnel: These individuals are DPG-certified MINICAMS[®] operators. Their specific hazardous waste responsibilities include:
 - Ensure personnel safety
 - Perform real-time air monitoring using MINICAMS[®]

- Perform confirmation sampling using bubblers or DAAMS
 - Document operations
 - Respond to emergencies
- Inspection Personnel: These individuals may be site personnel or entry personnel. Their specific hazardous waste responsibilities include:
 - Ensure personnel safety
 - Inspect Igloo G contents for permit compliance
 - Inspect emergency equipment for permit compliance
 - Respond to emergencies
 - Emergency Coordinators: These individuals are DPG personnel listed in Attachment 2-7, IG Contingency Plan of the Permit for Igloo G. Their specific hazardous waste responsibilities include:
 - Coordinate response personnel in case of emergency
 - Notify State in case of Igloo G emergency action
 - Emergency Response Support Personnel: These individuals include the DPG fire department personnel and DPG Chemical Accident/Incident Response and Assistance (CAIRA) personnel. Their specific hazardous waste responsibilities include:
 - Respond to emergencies at Igloo G
 - Coordinate emergency response activities with the Igloo G Emergency Coordinator

2.2 Training Requirements

- 2.2.1 Training is provided for each individual such that they understand and perform their hazardous waste related responsibilities as outlined in Section 2.1. The Training Director must approve all training activities. All training shall be documented as described in Section 4.
- 2.2.2 Igloo G training may include one or more specific topics depending on the individual(s) being trained. Table 2 indicates the training requirements for each specific job function.

3.0 IMPLEMENTATION OF THE TRAINING PROGRAM: R315-8-2.7

- 3.0.1 Initial and continuing training for Igloo G personnel may be accomplished by a combination of classroom, computer-based, video-based instruction, skills demonstration, and on-the-job-training. Experienced peers or supervisors may provide on-the-job training if it is approved and documented by the Training Director.

3.1 Initial Training

- 3.1.1 Igloo G personnel shall fulfill the initial hazardous waste training requirements within 6 months of starting permit-related activities. Employees shall not work unsupervised until initial training is complete.

3.2 Continuing Training

- 3.2.1 Table 1 indicates which training components are to be provided on an annual basis. Required annual training will be received each calendar year. The Permittee may provide training in addition to that outlined in Table 1 to ensure that all personnel understand and comply with Permit requirements.

4.0 TRAINING DOCUMENTATION: R315-8-2.7(d) and (e)

- 4.0.1 The Training Director maintains training documentation. Section 4.1 describes the training plan documentation requirements. Section 4.2 describes employee training documentation requirements.

4.1 Training Plan

- 4.1.1 The DEP Permit Coordinator maintains a current version of the Igloo G Training Plan. In addition, the Igloo G Site Manager maintains copies of the current plan.
- 4.1.2 The DEP Permit Coordinator is responsible for an annual review of this training plan (R315-8-2.6). Updates of this plan may be required as a result of changes involving regulations, waste type, operations, techniques, equipment, or the facility-specific emergency contingency plan procedures.

4.2 Employee Training Records

- 4.2.1 The Training Director maintains training records for Igloo G hazardous waste permit compliance. The Igloo G Site Manager shall also maintain copies of training records. Non-hazardous waste training shall be maintained in other DPG locations such as the Safety Office, the Surety Office, and the Toxicological Agent Protective (TAP) laundry. Original training records for hazardous waste compliance shall include:

- Name of employee
- Job title
- Training and experience requirements
- Applicable pre-employment training and education records
- Required initial and continuing training
- Record of completion of training and date of completion

| Table 1 Igloo G Hazardous Waste Management Training Requirements. | | | | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|-------------------------|------------------------|---------------------------------|-----------------------------|-----------------------------------------|---------------------------------------------------------|
| Training Requirement | Site Manager | Site Technicians | Entry Personnel | Air Monitoring Personnel | Inspection Personnel | Emergency/Alternate Coordinators | Emergency Response Support Personnel¹ |
| <u>Igloo G Site Specific</u> <ul style="list-style-type: none"> • Permit overview • Operating records • Waste characterization • Waste receipt • Waste inventory • Waste inspections • Container management • Air monitoring • Protective equipment • Entry procedures | IA | IA | IA | IA | IA | IA | ---- |
| <u>Igloo G Contingency Plan</u> <ul style="list-style-type: none"> • Emergency response • Contingency plans | IA | IA | IA | IA | IA | IA | IA |
| IA = Initial and annual training required | | | | | | | |